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7
8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
10

11 ALEX VILLANUEVA,

12 Plaintiff,

13 v.

14 COUNTY OF LOS ANGELES,
COUNTY OF LOS ANGELES
15 SHERIFF'S DEPARTMENT, LOS
ANGELES COUNTY BOARD OF
16 SUPERVISORS, COUNTY EQUITY
OVERSIGHT PANEL, LOS
17 ANGELES COUNTY OFFICE OF
INSPECTOR GENERAL,
18 CONSTANCE KOMOROSKI,
MERCEDES CRUZ, ROBERTA
19 YANG, LAURA LECRIVAIN,
SERGIO V. ESCOBEDO, RON
20 KOPPERUD, ROBERT G. LUNA,
MAX-GUSTAF HUNTSMAN,
21 ESTHER LIM, and DOES 1 to 100,
inclusive,

22 Defendants.
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CASE NO. 2:24-cv-04979 SVW (JCx)

**SUPPLEMENTAL DECLARATION
OF JASON H. TOKORO IN
SUPPORT OF REPLY IN SUPPORT
OF DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

*[Filed Concurrently with Reply in
Support of Motion for Summary
Judgment; Reply Separate Statement;
and Evidentiary Objections to
Declaration of Alex Villanueva]*

Date: May 19, 2025

Time: 1:30 p.m.

Crtrm.: 10A

Assigned to the Hon. Stephen V.
Wilson and Magistrate Judge Jacqueline
Chooljian

Trial Date: June 3, 2025

SUPPLEMENTAL DECLARATION OF JASON H. TOKORO

I, Jason H. Tokoro, declare as follows:

1. I am an attorney duly admitted to practice before this Court. I am a partner with Miller Barondess, LLP, counsel of record for Defendants. I have personal knowledge of the facts set forth herein, and if called as a witness, I could and would competently testify to all of said facts. I make this declaration in support of Defendants' Reply In Support of Their Motion for Summary Judgment.

The Parties' Summary-Judgment Filings

2. On April 21, 2025, Defendants filed their Motion for Summary Judgment and Memorandum of Points and Authorities in support thereof (the "Motion"). (See Dkt. Nos. 89, 89-1.)

3. Along with the Motion, Defendants also filed numerous supporting declarations and a Compendium of Evidence upon which Defendants' Motion relied. (See Dkt. No. 89-17.)

4. On April 28, 2025, Plaintiff filed his Opposition to Defendants' Motion. (Dkt. No. 105.) In support thereof, Plaintiff filed an Appendix of Exhibits (Dkt. Nos. 105-3 to 105-7) as well as a declaration from Plaintiff. (Dkt. No. 105-8.)

5. In his Opposition and supporting pleadings, Plaintiff raised arguments or introduced new purported "facts" that are contradicted by the evidence in this case or by Plaintiff's own prior statements. Because Plaintiff raised these issues for the first time in his Opposition, Defendants are entitled to introduce targeted responsive evidence on reply. *Young v. Allstate Co.*, 662 F. Supp. 3d 1066, 1073 (C.D. Cal. 2023) (held that "a party may introduce evidence that directly responds to evidence provided in Opposition papers").

Plaintiff's Statements Regarding the "Do Not Rehire" Notation

6. In his declaration, Plaintiff states, "Everyone in County administration knows what that label means" and that Plaintiff is familiar with the "Do Not Rehire" notation due to his time as Sheriff, where he "served as the head of an agency with

1 over 18,000 employees” and “oversaw hiring, promotions, background
2 investigations, and personnel decisions across every division.” (Dkt. No. 105-8
3 ¶ 25.)

4 7. These statements are contrary to Plaintiff’s prior statements, including
5 in his book, in his pleadings, and at deposition. He has repeatedly stated that the file
6 notation was created *after* his time in office, specifically to punish him.

7 8. In December 2024, while this litigation was ongoing, Plaintiff
8 published an autobiography titled, “Sheriff: Holding the Thin Blue Line in a Deep
9 Blue State.” Plaintiff verified that he wrote the book at his deposition. In it,
10 Plaintiff wrote the following about the “Do Not Rehire” notation:

11 In essence, this was a brazen form of electioneering, using two expired
12 investigations that had been cleared back in 2022, with no violation of
13 policy as the finding. The puppet Sheriff Luna unlawfully revived them
14 . . . The cases were revived within a week of when I filed the papers, a
15 sham investigation was quickly assembled that excluded any information
16 already submitted in the original investigation, and they turned the
17 previous unfounded investigation into a founded one. *The kangaroo
panel then invented an entirely new category, “Do Not Rehire,”
something never before used against a department employee, let alone
an elected official.*

18 (Emphasis added.) A true and correct copy of this excerpt from Plaintiff’s book is
19 attached hereto as **Exhibit 80**.

20 9. Plaintiff said the same thing at his deposition. There, Plaintiff was
21 asked whether he was aware of receiving the notation on his file, and what he
22 understood it to mean. Plaintiff testified the notation was created “*solely for this
23 purpose*” and was “*a political construct designed to damage and defame*. That’s
24 all it is.” A true and correct copy of this excerpt from Plaintiff’s deposition is
25 attached hereto as **Exhibit 81**.

26 10. Plaintiff made similar statements his First Amended Complaint, calling
27 his notation “unprecedented (First Amended Complaint (“FAC”) at 3:23), and
28 claiming that “no similar action” had been taken before against public officials (*id.*

1 at 3:25).

2 **Plaintiff's Testimony Regarding the "Closed" Investigations**

3 11. Plaintiff has provided numerous contradictory statements regarding his
4 belief that the investigations into his misconduct were closed and then reopened.

5 12. At first, Plaintiff claimed that after he learned of the "Do Not Rehire"
6 notation in *January 2024*, he spoke to former Chief of Professional Standards Ed
7 Alvarez, who stated the Department determined no policy violations occurred and
8 that the complaints by Huntsman and Lim were placed into a "suspense file." (FAC
9 ¶ 17.)

10 13. Then, at his deposition, Plaintiff claimed that the source of this
11 information was a conversation with John Satterfield that occurred sometime around
12 *July 2022*. (See **Exhibit 81** at 242:8–15.)

13 14. Now, in his Opposition—for the first time ever—Plaintiff contends that
14 the investigations were "completed" in *May 2023* and then reopened in October
15 2023. (Opp. at 6:10–19.)

16 **Plaintiff's Testimony Regarding His Speech at Board Meetings**

17 15. In his declaration and Separate Statement, Plaintiff states that the Board
18 of Supervisors provided him only three minutes of time to speak, and could only
19 speak as a private citizen, while other department heads were given "unlimited
20 time." (See Plaintiff's Separate Statement No. 2; Villanueva Decl. ¶ 14.)

21 16. This is false and is contradicted by the testimony of Victoria
22 Pawlowski, who attended those meetings and noted that Plaintiff was given five
23 minutes to speak on any topic he so chose, a privilege that was not afforded to any
24 other department head. A true and correct copy of Ms. Pawlowski's deposition
25 testimony is attached hereto as **Exhibit 82**.

26 **Plaintiff's Statement Regarding Ms. Lim's "False" Testimony**

27 17. In his Separate Statement No. 23, Plaintiff states that Ms. Lim "falsely
28 claimed it was a mutual decision" for her to stop Tweeting.

1 18. In fact, Ms. Lim testified that it was a “joint” decision where she
2 concurred with Supervisor Solis that she would stop Tweeting. A true and correct
3 copy of Ms. Lim’s testimony is attached hereto as **Exhibit 83**.

4 I declare under penalty of perjury under the laws of the United States of
5 America that the foregoing is true and correct.

6 Executed on this 5th day of May, 2025, at Los Angeles, California.

7
8 /s/ Jason H. Tokoro
9 Jason H. Tokoro
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INDEX OF EXHIBITS TO THE DECLARATION OF JASON H. TOKORO

Exhibit No.	Description	Pg. No.
80.	Relevant excerpts from Plaintiff's book, "Sheriff: Holding the Thin Blue Line in a Deep Blue State."	7-10
81.	Relevant excerpts from the February 28, 2025 deposition transcript of Plaintiff	11-21
82.	Relevant excerpts from the March 4, 2025 deposition transcript of Veronica Pawlowski (Vol. I)	22-29
83.	Relevant excerpts from the March 21, 2025 deposition transcript of Esther Lim	30-35

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TEL: (310) 552-4400 FAX: (310) 552-8400

EXHIBIT 80

SHERIFF

HOLDING THE THIN BLUE LINE IN A DEEP BLUE STATE



ALEX VILLANUEVA

In essence, this was a brazen form of electioneering, using two expired investigations that had been cleared back in 2022, with no violation of policy as the finding. The puppet Sheriff Luna unlawfully revived them, knowing full well the cases were beyond statute date for one, and perhaps more importantly, did not apply to the elected sheriff's office. The cases were revived within a week of when I filed the papers, a sham investigation was quickly assembled that excluded any information already submitted in the original investigation, and they turned the previous unfounded investigation into a founded one. The kangaroo panel then invented an entirely new category, "Do Not Rehire," something never before used against a department employee, much less an elected official. Curiously, the county never attempted this against three elected officials who became convicted felons, including assessor John Noguez, sheriff Lee Baca, and most recently supervisor Mark Ridley-Thomas.

Of course, the Times reporter showed no interest in researching the unprecedented nature of the report, or even the mere fact that the kangaroo panel had their result in October of 2023, but decided to either leak it to the Times back then, or worse, worked with the Times to release it when it would have the greatest

impact on the elections. The COC held a new round of "special hearings" on deputy gangs in the runup to the 2024 Primaries as well, focusing on subpoenaing myself and my undersheriff, Tim Murakami, once again. They showed no interest in subpoenaing the current sheriff at the time, Luna, or my predecessors, Baca, John Scott, or McDonnell. Supervisor Janice Hahn's campaign jumped on the Times article, and blasted out mass emails telling voters that they should not rehire the former sheriff either.

This Times article was a gem in many ways, revealing how the county colluded with the newspaper to defame my reputation on the eve of yet another election, a new October surprise delivered on the eve of voting in the 2024 primary. The convicted felon Blakinger continued the pile-on with this:

On Wednesday, the Sheriff's Department confirmed to The Times that it upheld the panel's recommendation. Meanwhile, Huntsman said he was "happy" with the finding.

"I'm glad that Villanueva is no longer the sheriff and, now that he is gone, the facts have been treated in a more fair and objective way,"

SHERIFF

HOLDING THE THIN BLUE LINE IN A DEEP BLUE STATE

This is the true story of Alex Villanueva, who spent four decades in public service, rising through the ranks to become the 33rd Sheriff of Los Angeles County, the largest sheriff's department and the third largest law enforcement agency in the nation. It's a story of overcoming adversity from an early age, leading a career fraught with the danger of speaking truth to power, overcoming obstacles, and winning an improbable race to unseat an incumbent sheriff. This is a modern David versus Goliath story, but then Goliath discovered lawfare...



Alex Villanueva is a unique American politician, from humble origins, who survived a career challenging a corrupt political establishment, overcame adversity, and ultimately succeeded in becoming the 33rd Sheriff of Los Angeles County, unseating an incumbent sheriff for the first time in over a century. Here is his story...

AMERICAN
PUBLISHERS INC.

ISBN 9781917613422



9 781917 613422



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EXHIBIT 81

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

ALEX VILLANUEVA,

No. 2:24-CV-04979

SVW (JCx)

Plaintiff,

vs.

COUNTY OF LOS ANGELES, COUNTY OF
LOS ANGELES SHERIFF'S DEPARTMENT,
LOS ANGELES COUNTY BOARD OF
SUPERVISORS, COUNTY EQUITY OVERSIGHT
PANEL, LOS ANGELES COUNTY OFFICE OF
INSPECTOR GENERAL, CONSTANCE
KOMOROSKI, MERCEDES CRUZ, ROBERT A.
YANG, LAURA LECRIVAIN, SERGIO V.
ESCOBEDO, RON KOPPERUD, ROBERT G.
LUNA, MAX-GUSTAF HUNTSMAN, ESTHER
LIM, and DOES 1 to 100, inclusive,

Defendants.

VIDEOTAPED DEPOSITION of ALEX VILLANUEVA
LOS ANGELES, CALIFORNIA
FRIDAY, FEBRUARY 28, 2025
VOLUME 1

Reported by
Daryl Baucum, RPR, CRR, RMR, CSR No. 10356

Job No. 7184228, PAGES 1 - 334

Page 1

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

ALEX VILLANUEVA,

No. 2:24-CV-04979

SVW (JCx)

Plaintiff,

vs.

COUNTY OF LOS ANGELES, COUNTY OF
LOS ANGELES SHERIFF'S DEPARTMENT,
LOS ANGELES COUNTY BOARD OF
SUPERVISORS, COUNTY EQUITY OVERSIGHT
PANEL, LOS ANGELES COUNTY OFFICE OF
INSPECTOR GENERAL, CONSTANCE
KOMOROSKI, MERCEDES CRUZ, ROBERT A.
YANG, LAURA LECRIVAIN, SERGIO V.
ESCOBEDO, RON KOPPERUD, ROBERT G.
LUNA, MAX-GUSTAF HUNTSMAN, ESTHER
LIM, and DOES 1 to 100, inclusive,

Defendants.

VIDEOTAPED DEPOSITION of ALEX VILLANUEVA,
at Miller, Barondess, 2121 Avenue of the Stars,
Suite 2600, Los Angeles, California, beginning
at 10:05 a.m., and ending at 5:16 p.m., on
Friday, February 28, 2025, before Daryl Baucum,
RPR, CRR, RMR, CSR No. 10356.

Page 2

1 APPEARANCES OF COUNSEL:

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3 FOR THE PLAINTIFF:

4
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Page 3

1 APPEARANCES OF COUNSEL (CONTINUED):

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3
4 ALSO PRESENT:

5 JON MANUEL, Videographer
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Page 4

1 BY MR. TOKORO:

14:47:05

2 Q Now, are you aware that at some point,
3 Ms. Lim's complaint was submitted to the County
4 Equity Oversight Panel, correct?

5 A Yes.

14:47:35

6 Q And I'm -- just for ease of reference, I'm
7 just going to refer to them as the CEOP.

8 Is that okay with you?

9 A Yes.

10 Q And so you are aware that in -- through

14:47:43

11 your PRA request that in August of 2023, the CEOP
12 undertook to look at Ms. Lim's allegations, correct?

13 A Correct.

14 Q And the CEOP recommended that four of the
15 five allegations be founded, correct?

14:47:56

16 A Yes.

17 Q And that you are also aware that the
18 Department concurred in that recommendation,
19 correct?

20 A Those in the administration, yes,

14:48:09

21 shocking.

22 Q And the recommendation was also to put a
23 do-not-rehire notation at the top of your personal
24 file, correct?

25 A Yes.

14:48:23

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1 Q What is your understanding of the
14:48:23

2 do-not-rehire notation?

3 A It was created for solely this purpose.

4 Q So your belief is that prior to you being
5 given the do-not-rehire notation, nobody else at the
14:48:32

6 County had ever been given it?

7 A In the Sheriff's Department, no one had
8 ever been given it.

9 Q And you believe no one else has been given
10 that same notation since you left office?

14:48:44

11 A One more person got it now.

12 Q Who is that?

13 A Mark Lillienfeld.

14 Q And what do you understand the
15 do-not-rehire notation means?

14:49:06

16 A It's a political construct designed to
17 damage and defame. That's all it is.

18 Q That's it?

19 A And it, obviously, is going to give people
20 cause to say oh, let's not hire them.

14:49:18

21 Q Anything else?

22 A It's negative. I mean it's a black eye,
23 especially after thirty-six years of faithful public
24 service to get that connotation on your file and
25 then not even being able to defend it or have input

14:49:36

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1 Q So now, I am confused because I thought
15:36:26

2 you had just said it was a conversation that you had
3 with Ed Alvarez after you got the PRA materials.

4 A That's what I heard in '22, but fast
5 forward to this do not hire, the PRA request, and
15:36:39

6 then I got specific. So I went to the source, Eddie
7 Alvarez, and he told me the details.

8 Q So who told you in 2022 when you were
9 still in office that the investigation ended without
10 any findings of misconduct?

15:36:56

11 A I believe that was Satterfield.

12 Q John Satterfield.

13 A Yes.

14 Q Your Chief of Staff.

15 A Yes.

15:37:08

16 Q He doesn't work in IAB, correct?

17 A No.

18 Q He doesn't work at Sanders, Roberts,
19 correct?

20 A What?

15:37:13

21 Q Sanders, Roberts, the law firm that was
22 hired --

23 A No.

24 Q -- to do the independent investigation,
25 correct?

15:37:18

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1 STATE OF _____)
) Ss.
2 COUNTY OF _____)
3

4 I, DARYL BAUCUM, a Certified Shorthand
5 Reporter of the State of California, do hereby
6 certify;

7 That the foregoing proceedings were taken
8 before me at the time and place herein set forth,
9 at which time the witness named in the foregoing
10 proceeding was placed under oath; that a record
11 of the proceedings was made by me using machine
12 shorthand which was thereafter transcribed under my
13 direction; and that the foregoing pages contain a
14 full, true and accurate record of all proceedings
15 and testimony to the best of my skill and ability.

16 I further certify that I am neither
17 financially interested in the outcome nor a relative
18 or employee of any attorney or any party to this
19 action.

20 IN WITNESS WHEREOF, I have subscribed my
21 name this 5th day of March 2025.
22

23 
24

25 DARYL BAUCUM, CSR No. 10356

JASON H. TOKORO, ESQ.

JTokoro@MillerBarondess.com

March 5, 2025

RE: Villanueva, Alex v. County Of Los Angeles

2/28/2025, Alex Villanueva , Volume 1, (#7184228).

The above-referenced transcript has been

completed by Veritext Legal Solutions and

review of the transcript is being handled as follows:

___ Per CA State Code (CCP 2025.520 (a)-(e)) - Contact Veritext
to schedule a time to review the original transcript at
a Veritext office.

___ Per CA State Code (CCP 2025.520 (a)-(e)) - Locked .PDF
Transcript - The witness should review the transcript and
make any necessary corrections on the errata pages included
below, notating the page and line number of the corrections.
The witness should then sign and date the errata and penalty
of perjury pages and return the completed pages to all
appearing counsel within the period of time determined at
the deposition or provided by the Code of Civil Procedure.
Contact Veritext when the sealed original is required.

___ Waiving the CA Code of Civil Procedure per Stipulation of
Counsel - Original transcript to be released for signature
as determined at the deposition.

___ Signature Waived - Reading & Signature was waived at the
time of the deposition.

Page 335

1 ___ Federal R&S Requested (FRCP 30(e)(1)(B)) - Locked .PDF
2 Transcript - The witness should review the transcript and
3 make any necessary corrections on the errata pages included
4 below, notating the page and line number of the corrections.
5 The witness should then sign and date the errata and penalty
6 of perjury pages and return the completed pages to all
7 appearing counsel within the period of time determined at
8 the deposition or provided by the Federal Rules.
9 _X_ Federal R&S Not Requested - Reading & Signature was not
10 requested before the completion of the deposition.

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EXHIBIT 82

CERTIFIED COPY



1605 W. Olympic Blvd., Suite 800 Los Angeles, CA 90015

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

ALEX VILLANUEVA vs COUNTY OF LOS ANGELES

VERONICA PAWLOWSKI

March 04, 2025

Lynn Ann Waters, RMR, CRR, CSR No. 14432, Job No. 6477

1 UNITED STATES DISTRICT COURT
2 CENTRAL DISTRICT OF CALIFORNIA
3 WESTERN DIVISION
4

5 ALEX VILLANUEVA,

6
7 Plaintiff,

8 -vs- CASE NO. 2:24-cv
-04979 SVW (JCx)

9 COUNTY OF LOS ANGELES, et al.,

10 Defendants.

11 Deposition of
12 VERONICA PAWLOWSKI

13 TUESDAY, MARCH 4, 2025
10:00 a.m.

14 Taken via Zoom videoconference
15

16 REPORTER: Lynn Ann Waters, RMR, CRR, CSR No. 14432
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PAWLOWSKI, VERONICA

Page 2

1 APPEARANCES:

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On behalf of the Defendant.

ALSO PRESENT:

Steven Williamson
Alex Villanueva

PAWLOWSKI, VERONICA

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1 Q. And what subjects do you recall?

2 A. I recall -- excuse me. Sorry.

3 I recall that at some point during
4 my time with the board, the board gave Sheriff
5 Villanueva five minutes at the board of
6 supervisors meetings to address the board on
7 whatever issue he wished to address them.

8 Q. And do you recall -- sorry.

9 Do you recall how many times
10 Sheriff Villanueva availed himself of those five
11 minutes?

12 A. No.

13 Q. And do you recall what subjects he
14 used those five minutes to speak about?

15 A. He would speak sometimes about
16 COVID.

17 He would speak sometimes about if
18 there was an item or motion on the board's agenda
19 that he wanted to speak on, he would speak about
20 that.

21 Q. Do you recall Sheriff Villanueva in
22 the five minutes he had before the board of
23 supervisors ever directly referencing you?

24 A. No.

25 Q. Do you recall Sheriff Villanueva

PAWLOWSKI, VERONICA

Page 60

1 A. No.

2 Q. Did you ever hear Sheriff
3 Villanueva make any reference to Mark Ridley
4 Thomas's race at any time?

5 A. No.

6 Q. Just to take a step back. Separate
7 and apart from Sheriff Villanueva's comments, what
8 is the Peace over Violence contract?

9 A. Peace over Violence is an
10 organization that does work in the area of
11 domestic violence and intimate partner violence.

12 And Peace over Violence had a
13 contract with LA Metro to run a hotline.

14 Q. By the way, just to take a step
15 back for a moment, you said the board of
16 supervisors gave Sheriff Villanueva five minutes
17 to address them; is that your testimony?

18 A. They gave him five minutes at the
19 beginning of meetings for a period of time.

20 Q. Apart from Sheriff Villanueva, are
21 you aware of any other head of the department that
22 had a time limit imposed on them in speaking to
23 the board of supervisors?

24 A. Everyone has a time limit.

25 Q. And so just to be clear, is it your

PAWLOWSKI, VERONICA

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1 testimony, just to make sure I understand it, is
2 it your testimony that every department head also
3 had a five minute limit to speak?

4 MR. TOKORO: Objection. Asked and
5 answered.

6 You can answer again.

7 A. Okay. Everyone had a time limit.

8 Q. Yeah, understood. Sorry. Maybe my
9 question was unclear, I'll just rephrase it.

10 Did -- to your knowledge, did every
11 department head have the same five minutes or were
12 the time limits different based on who was
13 speaking?

14 A. Sheriff Villanueva was the only
15 department head who was given the opportunity to
16 speak in this sort of open and free manner.

17 Q. While you were the senior justice
18 deputy and attended the Tuesday meetings of the
19 board of supervisors, besides Sheriff Villanueva,
20 did any other heads of departments come to address
21 the board of supervisors?

22 A. Yes.

23 Q. And do you recall any instance
24 where a head of a department came to address the
25 board of supervisors and they were given a time

PAWLOWSKI, VERONICA

Page 206

1 CERTIFICATE
2 OF
3 CERTIFIED SHORTHAND REPORTER
4 * * * *

5
6
7 The undersigned Certified Shorthand
8 Reporter of the State of California does hereby
9 certify:

10 That the foregoing Deposition was taken
11 before me at the time and place therein set forth,
12 at which time the Witness was duly sworn by me.

13 That the testimony of the Witness and
14 all objections made at the time of the Deposition
15 were recorded stenographically by me and were
16 thereafter transcribed, said transcript being a
17 true and correct copy of the proceedings thereof.

18 In witness whereof, I have subscribed my
19 name, this date: March 17, 2025.

20
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23
24
25

Lynn Ann Waters

LYNN ANN WATERS, CSR NO. 14432

EXHIBIT 83

CERTIFIED COPY



1605 W. Olympic Blvd., Suite 800 Los Angeles, CA 90015

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

ALEX VILLANUEVA vs COUNTY OF LOS ANGELES

ESTHER LIM

March 21, 2025

Shannon D. Denney, CSR No. 10385, Job No. 6454

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

ALEX VILLANUEVA,)	
)	
Plaintiff,)	
)	
vs.)	No: 2:24-cv-04979
)	SVW (JCx)
COUNTY OF LOS ANGELES, COUNTY OF)	
LOS ANGELES SHERIFFS DEPARTMENT,)	
LOS ANGELES COUNTY BOARD OF)	
SUPERVISORS, COUNTY EQUITY)	
OVERSIGHT PANEL, LOS ANGELES COUNTY)	
OFFICE OF INSPECTOR GENERAL,)	
CONSTANCE KOMOROSKI, MERCEDES CRUZ,)	
ROBERTA YANG, LAURA LECRIVAIN,)	
SERGIO V. ESCOBEDO, RON KOPPERUD,)	
ROBERT G. LUNA, MAX-GUSTAF HUNTSMAN)	
ESTHER LIM, and DOES 1 to 100,)	
inclusive,)	
)	
Defendants.)	
)	

DEPOSITION OF: ESTHER LIM

March 21, 2025

REPORTED BY: SHANNON D. DENNEY, CSR No. 10385

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2

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1 not to use it. And she agreed do so.

2 You can answer that question, again.

3 THE WITNESS: Again, Mr. DiBona, the
4 discipline was that I not use my social media account.
5 And so I -- that was the agreement, I would not use my
6 social media account as part of my discipline.

7 Q. MR. DiBONA: And therefore -- let me ask this
8 way.

9 Why did you tell Ms. Herrera that there was a
10 joint decision that you would not make your social
11 media account?

12 A. I mean, that's part of the discipline that --
13 that Supervisor Solis said, right. And so I agreed to
14 that discipline, that I would not use my social media
15 account.

16 Q. And you never told Ms. Diaz-Herrera that you
17 were disciplined, correct?

18 A. I don't recall in this conversation.

19 Q. While I'm scrolling, did you ever send Ms.
20 Diaz-Herrera any of the transcripts of the Facebook
21 lives that are referenced?

22 A. I don't recall sending Ms. Herrera any
23 documents.

24 But I do -- I do refer to them, and talk
25 about them.

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1 STATE OF CALIFORNIA

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4 I, SHANNON D. DENNEY, CSR 10385, a Certified
5 Shorthand Reporter in and for the State of California,
6 do hereby certify that, prior to being examined, the
7 witness named in the foregoing deposition was by me
8 duly sworn to testify the truth, the whole truth, and
9 nothing but the truth; that said deposition was taken
10 down by me in shorthand at the time and place named
11 therein and was thereafter transcribed under my
12 supervision; that this transcript contains a full, true
13 and correct record of the proceedings which took place
14 at the time and place set forth in the caption hereto.

15 I further certify that I have no interest in
16 the event of this action.

17

18 EXECUTED this 1st day of April, 2025.

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Shannon D. Denney

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Shannon D. Denney, CSR 10385

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